

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

KANIKA BRAXTON, on behalf of herself)	CASE NO. 1:20-cv-02111-SO
and all others similarly situated,)	
)	JUDGE SOLOMON OLIVER, JR.
Plaintiff,)	
)	
vs.)	
)	<u>JOINT STATUS REPORT AND MOTION TO</u>
ENLIVANT MASTER MANAGEMENT)	<u>STAY PROCEEDINGS</u>
CO., LLC)	
)	
Defendant.)	
)	

Plaintiff Kanika Braxton (“Plaintiff”) and Defendant Enlivant Master Mgmt. Co., LLC (collectively, the “Parties”), hereby submit this Joint Status Report and Motion to Stay Proceedings.

On October 19, 2020, Defendant filed a Motion to Compel Bilateral Arbitration and Dismiss Proceedings. After discussions between Counsel, the Parties decided that it would be a more efficient use of the Parties’ and this Court’s time to discuss resolution of the claims alleged in this action and to delay further briefing on Defendant’s Motion. On November 6, 2020, the Court granted the Parties’ Joint Motion to Stay Proceedings in order to allow the Parties to explore possible settlement and ordered that they update the Court on the status of those discussions via a Joint Status Report on or before December 3, 2020. (ECF No. 9.)

The Parties have exchanged documents and information, and Plaintiffs are in the process of reviewing and analyzing the time and pay records of Plaintiff and the Opt-In Plaintiffs for purposes of calculating their potential damages. Counsel for the Parties have engaged in further

discussions, and the Parties remain hopeful that they can reach a resolution, but require more time to continue their settlement discussions.

The Parties respectfully request an additional 30-day stay of these proceedings in order to enable them to continue to explore early resolution of the claims of Plaintiff and the nineteen (19) Opt-In Plaintiffs who have filed consent forms in this action. Because the Parties have made progress towards reaching a resolution, they desire to continue to spend their time and efforts attempting to reach a resolution of the case without further litigation or unnecessary costs.

Within thirty (30) days, or by January 4, 2020 (as 30 days falls on a Saturday), the Parties will jointly inform the Court of the status of settlement negotiations by filing a Joint Status Report.

Respectfully submitted,

/s/ Chastity L. Christy

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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2020, a copy of the foregoing *Joint Status Report and Motion to Stay Proceedings* was sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Chastity L. Christy
One of the Attorneys for Plaintiffs